

COUNT 2

(Money Laundering Conspiracy, 18 U.S.C. § 1956(h))

The Grand Jury further charges:

2. From in or around July 2019 to in or around August 2019, the exact dates being unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants MARVIN JACOBO-ESCOBAR, Clemente Gutierrez-Meraz (charged separately), and others known and unknown to the Grand Jury did knowingly and intentionally combine, conspire, confederate, and agree with each other and diverse others to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, distribution of controlled substances in violation of Title 21, United States Code, Section 841(a)(1), knowing that the transactions were designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE

The Grand Jury further charges:

3. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853 (drug offense), and Title 18, United States Code, Section 982(a)(1) (money laundering offense), the allegations of Counts 1 and 2 are hereby re-alleged and incorporated herein by reference. As a result of the foregoing offenses, Defendant MARVIN JACOBO-

ESCOBAR shall forfeit to the United States: any and all property constituting, or derived from, any proceeds Defendant MARVIN JACOBO-ESCOBAR obtained, directly or indirectly, as the result of the drug offense; any and all of the defendant's property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the drug offense; and, all property, real and personal, involved in the money laundering offense, and all property traceable to such property including, but not limited to, the following:

- a. Money parcel containing \$5,000 in U.S. Currency and additional hollowed-out U.S. currency, seized on August 20, 2019.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.